

**EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

Scott Sedore, #210661

Plaintiff,

v.

Campbell et al

Defendants.

Case No.: 4:19-cv-10311

District Judge: Stephanie Dawkins Davis

Magistrate Judge: David R. Grand

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SCOTT SEDORE, #210661  
G. Robert Cotton Correctional Facility  
3500 N. Elm Road  
Jackson, MI 49201  
*Pro Se Plaintiff*

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**AFFIDAVIT OF MARY GREINER, D.O.**

STATE OF MICHIGAN                    )  
  )ss  
COUNTY OF JACKSON                )

I, MARY GREINER, D.O. first being duly sworn on oath, state that if I were called to testify as a witness in this matter, I would testify to the following facts

based upon my personal knowledge and review of Scott Sedore's Michigan Department of Corrections medical chart:

1. On all dates relevant to Plaintiff's Complaint, I was a medical doctor licensed in the State of Michigan.
2. I was a medical provider at the Gus Harrison Correctional Facility during the time period relevant to this case.
3. I first evaluated Mr. Sedore for a scheduled provider visit on October 25, 2017. I noted Mr. Sedore complained of constant throbbing leg pain that radiated to his lower back. Mr. Sedore also complained of right hip pain that he described as constant and stabbing. Mr. Sedore informed me that he had tried Neurontin and Cymbalta without improvement to his pain.
4. Mr. Sedore also reported that prior to the accident, he was taking Norco, Fentanyl, Ultram and Dilaudid for chronic lower back pain. I noted that Mr. Sedore turned in his Motrin and Tylenol because they were not helping, and he refused Neurontin because the low dose was not helping.
5. I noted that Mr. Sedore had his case reviewed by the PMC on May 9 and June 20 of 2017, and most recently they determined that there was not a need for non-formulary medicine. Mr. Sedore had an upcoming appointment with orthopedics and neurosurgery. I informed Mr. Sedore I

- would defer to the PMC and the specialists for guidance on pain management.
6. On November 16, 2017, Mr. Sedore presented for a provider visit to discuss his accommodation needs.
  7. Mr. Sedore requested a private, portable, elevated toilet seat. I noted Mr. Sedore's upcoming orthopedic and neurosurgeon consultations, as well as his special accommodations for an aide for room duties, extra cotton blankets, and extra pillows.
  8. During this visit, I observed Mr. Sedore rise out of his wheelchair to use the scale, leave the wheelchair in the hall, ambulate to the chair in my office, and rise out of the chair using his cane without struggle. I spoke with the nursing supervisor and staff from his housing unit. Based on these observations and discussions, I determined that Mr. Sedore should continue to use the handicap toilet provided in his handicap wing, to remove the detail for extra cotton blankets as there was no justification in the note where they were given, and to discontinue his detail for an aide in his room as it is not a service that medical details are given for.
  9. This was my last involvement with Mr. Sedore.
  10. As a Corizon medical provider I am not involved in the scheduling or rescheduling of off-site appointments as that is not a function of my job.

11. As it relates to off-site appointments, my job function is only to place consultation requests (407s) for review to the Utilization Management office.

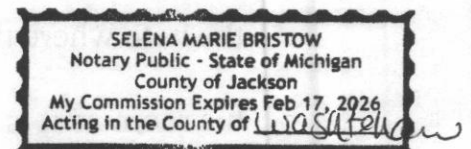
12. My involvement with Mr. Sedore's care as it relates to the allegations in his Complaint is limited to the issues set forth in this affidavit. The matters stated in this Affidavit are based on my personal knowledge and review of his Michigan Department of Corrections medical records during the relevant time period.

13. I do not believe that I, in any way, acted with deliberate indifference in Mr. Sedore's case, as I treated him in a manner that I, in my medical judgment, feel was appropriate.

Further affiant sayeth not.

Mary Greiner D.O.  
MARY GREINER, D.O.

Subscribed and sworn to before me  
This 29 day of Dec, 2021.



Selena Bristow  
Notary Public, State of Michigan  
County of Jackson  
My Commission Expires: 2-17-2026  
Acting in the County of Washtenaw

